UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

UNITED STATES OF AMERICA		
)	CRIMINAL NO.: 3:14-cr-87-HTW-FKB
v.)	
)	
JOHN LOUIS BLALACK)	
SARAH ADELIA GRAVES)	
ROBERT HENRY RICE)	
SHELBIE BROOKE RICHARDS)	
)	

GOVERNMENT'S MOTION FOR JURY QUESTIONNAIRE & INDIVIDUAL VOIR DIRE

COMES NOW the United States of America by and through its designated representatives and hereby moves the Court for an order permitting the use of a jury questionnaire and authorizing individual voir dire in the above captioned case. As a basis for this motion, the Government states as follows:

- 1. The above-named case is scheduled for jury trial on January 26, 2015. At present, the case consists of four defendants each facing multiple charges in an eight-count Indictment.
- 2. In the case at hand, given the nature of the charges and the pre-trial publicity surrounding the case, the United States believes that permitting the use of a jury questionnaire and individual voir dire will allow for a more efficient jury selection process by: (1) providing counsel with sufficient information concerning each juror to enable the parties to intelligently exercise their challenges; (2) expediting the voir dire process; and (3) ensuring the entire venire panel is not tainted by the bias or prejudice of any individual potential juror.
 - 3. The Court has broad discretion in determining the nature and extent of the examination

of potential jurors. See Fed. R. Crim. P. 24. Permitting this questionnaire and individual voir

dire will create "a reasonable assurance that prejudice will be discovered if present." United

States v. Flores, 63 F.3d 1342, 1353 (5th Cir. 1995).

4. On October 15, 2014, counsel for the Government wrote to each of the defense counsel,

informing them of the Government's intention to seek a jury questionnaire, providing them a

copy of the proposed questionnaire, and soliciting any suggestions or changes. No substantive

response was received.

5. A proposed questionnaire is attached as exhibit A.

6. The Government requests a return date for the questionnaire of January 5, 2014, and

further requests that the court direct the questionnaires be provided to all counsel 10 days prior to

trial.

WHEREFORE, the United States respectfully requests the Court approve the use of a jury

questionnaire and to permit the parties to conduct individual voir dire.

Respectfully submitted,

GREGORY K. DAVIS

United States Attorney

By: /s Glenda R. Haynes

Glenda R. Haynes

Assistant United States Attorney

MS Bar #: 2132

VANITA GUPTA

Acting Assistant Attorney General

Civil Rights Division

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By: <u>/s Sheldon L. Beer</u> Sheldon L. Beer

Sheldon L. Beer Trial Attorney MA Bar # 661165

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 19, 2014, I electronically filed a copy of the foregoing Government's Motion for Jury Questionnaire and Individual Voir Dire with the Clerk of the Court using the Electronic Case Filing system (ECF), which served to send notification of this filing to all counsels of record.

This 19th day of November, 2014.

/s Glenda R. Haynes Glenda R. Haynes Assistant United States Attorney

/s Sheldon L. Beer Sheldon L. Beer Trial Attorney